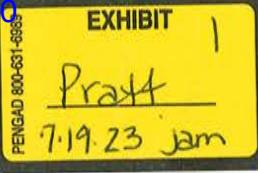


Exhibit 2



**GENESIS
FORENSICS**



GENESIS FORENSICS, INC.

OCTOBER 28, 2022

EXPERT REPORT BY

JEREMIAH PRATT, P.E., CFI, CFEI, CVFI

21GF-00125 - RYSMAN

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GENESIS FORENSICS, INC.

EXPERT REPORT BY

Jeremiah Pratt, P.E., CFI, CFEI, CVFI

October 28, 2022

21GF-00125 - Rysman

The following report was prepared for:
David Cain of Law Office of Cain, Geller & Vachereau
with an address of:

P.O. Box 6835
Scranton, PA 18505-6835

By:
Jeremiah Pratt, P.E., CFI, CFEI, CVFI of Genesis Forensics, Inc.
with an address of:

219 Whitins Road, Unit 7
Sutton, MA 01590

In regard to:
Genesis Forensics, Inc. case number 21GF-00125 - Rysman
Additional Reference Numbers: HD150-038845731-0001
Which involved a fire loss in a bathroom ceiling at 181 Clark Road, Brookline, MA.
The loss occurred on December 17, 2018.

The report documents the scientific analysis of the information and data involved in the loss using the scientific method. The report conforms to the guiding principles of:

- NFPA 921: Guide for Fire and Explosion Investigations 2021 edition
- NFPA 1033: Standard for Professional Qualifications for Fire Investigator 2014 edition
- ASTM E678 - 07(2013) Standard Practice for Evaluation of Scientific or Technical Data
- ASTM E620 – 18 Standard Practice for Reporting Opinions of Scientific or Technical Experts
- ASTM E3176 - 20 Standard Guide for Forensic Engineering Expert Reports

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SUMMARY

Based upon the education, training and experience of the author Jeremiah Pratt of Genesis Forensics, Inc. as well as the examination and review of the fire scene information and of the evidence from the scene, cognitive and physical testing, and review of the items listed below, it has been determined to a reasonable degree of scientific certainty that the cause for this December 17, 2018, fire at 181 Clark Road, Brookline, MA was a failure of the Broan Nutone ceiling fan within the second floor bathroom ceiling. This fire occurred within the area of origin defined as the ceiling space between the second-floor bathroom and the third floor. The fire spread through the ceiling void space. The ignition source was activity on the wiring within the fan connection box, the type and form of the first fuel was lightweight combustibles consisting of lint, dust, and debris, with secondary growth fuels such as the wiring insulation and plastic fan parts. The mechanism that brought the ignition source and the first fuel together is abrasion of the wire insulation due to vibration. All possible ignition sources within the ceiling space area of origin were examined, evaluated, and eliminated if possible, leaving the final hypothesis as a fire caused by arcing within the fan connection box.



Photo: 1) 181 Clark Road, Brookline, MA

Based upon the analysis my opinions are as follows:

- The fire originated within the Broan NuTone ceiling fan within the second-floor bathroom ceiling.
- The specific point of origin was the wiring within the fan connection box.
- The type and form of the first fuel was lightweight combustibles consisting of lint, dust, and debris.
- Growth fuels were available in the form of the wiring insulation and plastic fan parts.

- The mechanism that brought the ignition source and the first fuel together is the abrasion of the wire insulation due to vibration.
- Broan Nutone is responsible for this fire in that they manufactured the fan in a way that would allow the internal wiring to abrade against the metal walls of the connection box.

QUALIFICATIONS

Jeremiah Pratt is a licensed professional engineer (P.E.) who graduated from Worcester Polytechnic Institute in 2000 with a degree in Engineering and worked in industry designing products for both the commercial and Department of Defense sectors for 14 years. His experience includes a wide range of product systems, including microwave systems, military technology, utilities, robotics, residential and commercial building wiring, magnetism, semiconductor processing equipment, FDA-approved medical devices, automation systems and fire detection systems. Mr. Pratt has been engaged as a certified (CFI, CFEI, CVFI) origin & cause fire investigator/failure analyst for over 8 years, has provided expert testimony in over 10 depositions and arbitrations and has been court-qualified as an expert witness. Additionally, Mr. Pratt has over 25 years of firefighting experience with extensive classroom and live burn training and is currently the Massachusetts District 7 Fire Investigation Unit Training Coordinator. For further qualifications please see full Curriculum Vitae.

METHODOLOGY

The basic methodology utilized in the investigation of this fire is the scientific method as outlined in Chapter 4 of NFPA 921 Guide for Fire and Explosion Investigations, 2021 Edition.

SCIENTIFIC METHOD

The scientific method is a principle of inquiry that forms a basis for legitimate scientific and engineering processes, including fire incident investigation. (See Figure 1 below)

Section 3.3.160 defines the scientific method as:

The systematic pursuit of knowledge involving the recognition and definition of a problem; the collection of data through observation and experimentation; analysis of the data; the formulation, evaluation and testing of hypotheses; and, where possible, the selection of a final hypothesis.

The use of the scientific method during fire investigation analysis is mandated by NFPA 1033, Professional Qualifications for Fire Investigator.

The problem was defined as to determine the origin and cause of the fire, and if so warranted, to determine any responsibility for the cause of the fire, whether it be some action or inaction of a person or whether a product was responsible for the fire cause. To accomplish this, data was collected in many forms. That data was analyzed. From the analysis of the data, hypotheses were developed and tested in a continuous iterative process as new information was gathered. Testing and elimination of hypotheses led

to the selection of a final hypothesis as to the origin and cause of the fire. The process and application of the scientific method as well as the conclusions formed have been technically reviewed.



Figure 1) Scientific Method - NFPA 921 - 2021 edition

RECOGNIZE THE NEED AND DEFINE THE PROBLEM

On or about December 18, 2018, Michael J. Peters of Liberty Mutual contacted me, Jeremiah Pratt, regarding a fire that had occurred on December 17, 2018, at 181 Clark Road, Brookline, MA (the loss location). Mr. Peters on behalf of Liberty Mutual requested that I assist with fire origin and cause analysis at 181 Clark Road, Brookline, MA on December 20, 2018. A fire had occurred and a need to determine the cause and list it in a report so future similar incidents can be prevented was recognized (Recognize the need) In this case, a thorough origin and cause investigation needed to be conducted (Define the problem). This was done by an examination of the scene and by a combination of other data collection methods, such as the review of previously conducted investigations of the incident, the interviewing of witnesses or other knowledgeable persons, and the results of scientific testing. I was asked to review any statements, records, documents, and photographs that were provided that relate to the origin and cause issues, plus conduct testing and analysis as necessary including examination of the evidence recovered from the loss location to assist with the origin and cause analysis of the incident. Attorney David Cain of Law Office of Cain, Geller & Vachereau on behalf of Liberty Mutual further requested that Genesis Forensics address any responsibility for the fire and to address those aspects of the origin, cause, and responsibility in a written report.

COLLECTION OF DATA

The origin and cause collection of data and subsequent analysis included the following:

- Inspection of the loss site on December 20, 2018, and January 9, 2019
- Evidence examination on October 29, 2019
- Witness information
- Research
- Review of post fire photographs
- Hypothesis testing (cognitive and physical)

Information reviewed and relied upon, in part, for this determination:

- Complaint.docx
- 12-20-18 and 1-9-19 Notes
- Evidence Chain of Custody
- Fire scene examination photographs from December 20, 2018, and January 9, 2019
- Evidence examination photographs from October 29, 2019
- Sign in Sheets from December 20, 2018, and January 9, 2019, Scene Inspections and October 29, 2019, Lab Inspection
- NFPA 921: Guide for Fire and Explosion Investigations, 2021 edition
- NFPA 1033: Standard for Professional Qualifications for Fire Investigator, 2014 edition
- ASTM E678 – 07 (2013) Standard Practice for Evaluation of Scientific or Technical Data
- ASTM E620 – 18 Standard Practice for Reporting Opinions of Scientific or Technical Experts
- ASTM E3176 - 20 Standard Guide for Forensic Engineering Expert Reports
- ASTM E860 – 07 (2013) Standard Practice for Examining and Preparing Items That Are or May Become Involved in Criminal or Civil Litigation
- ASTM E1188 – 11 (2017) Standard Practice for Collection and Preservation of Information and Physical Items by a Technical Investigator
- Kirk's Fire Investigation, 7th Edition
- The SFPE Handbook of Fire Protection Engineering
- The Ignition Handbook by Vytenis Babrauskas, 2014

BACKGROUND INFORMATION

On December 17, 2018, a fire occurred at 181 Clark Road, Brookline, MA. The fire involved a Broan Nutone ceiling fan within the second-floor bathroom ceiling. The house was inhabited by Marc Rysman, his wife and his kids. At the time of the fire only his daughter was home. The daughter had arrived home from high school and shortly after heard the fire alarms. Prior to the alarms she had heard noises but did not smell anything. The noises scared her, so she sat with her dog. When the alarms went off she did not go upstairs but went immediately outside. She exited the house and called the fire department.

Both Marc and his wife are college level teachers. They had purchased the house in the early 2000's. No recent electrical work had been done, and there were never any electrical issues in the house.

Mr. Rysman did not ever remember cleaning the fan but did admit that the fan was occasionally left on for extended periods of time.

On November 23, 2021, Genesis Forensics opened a case file (#21GF-00125 - Rysman) subsequent to a request for Fire Origin & Cause and Forensic Engineering assistance requested by Attorney Darlene Thebaud of Law Office of Cain, Geller & Vachereau on behalf of Liberty Mutual. Prior to Genesis Forensics the case had been handled by Jeremiah Pratt at his former employer Wright Group, Inc. who transferred the file to Genesis at the request of Liberty Mutual. The Wright Group, Inc. had opened the case file on December 18, 2018.

On January 9, 2019, a joint scene examination at 181 Clark Road, Brookline, MA took place. In attendance was me (Jeremiah Pratt) of Genesis Forensics (working for Wright Group, Inc. at the time of inspection) on behalf of Liberty Mutual, Jim Seippel of Broan on behalf of Broan Nutone and James Rogers of Bay State Inspectional Agency on behalf of Broan Nutone. The scene was thoroughly processed, and all parties were given an opportunity to inspect the scene and any evidence as well as request retention of any additional evidence they wanted to inspect further. Four items of evidence were taken into storage subsequent to this inspection:

1. Fan Components from Floor Debris
2. Ceiling Fan Artifacts
3. Exemplar Fan from Second Floor Bathroom
4. Wiring from 2nd Floor Bathroom Ceiling

On October 29, 2019, a joint laboratory examination of the evidence recovered from 181 Clark Road, Brookline, MA took place at the Wright Group, Inc. In attendance was me (Jeremiah Pratt) of Genesis Forensics (working for Wright Group, Inc. at the time of inspection) on behalf of Liberty Mutual, Jim Seippel of Broan on behalf of Broan Nutone, James Smolka of ESI on behalf of Broan Nutone and Melanie Dadah of Wright Group, Inc. on behalf of Liberty Mutual. The evidence previously recovered was inspected. The information learned at the laboratory inspection is detailed in the "Cause Data Collection & Data Analysis" section of the report.

ORIGIN & CAUSE SCENE EXAMINATION

Before a cause hypothesis can be developed the investigator must first determine and define the area of origin. NFPA 921: Guide for Fire and Explosion Investigations 2021 edition states the following:

18.1.2 Determination of the origin of the fire involves the coordination of information derived from one or more of the following:

- 1) Witness Information and/or Electronic Data. The analysis of observations reported by persons who witnessed the fire or were aware of conditions present at the time of the fire as well as the analysis of electronic data including but not limited to security camera footage, alarm system activation, or other such data recorded in and around the time of the fire event (see Chapter 14)*
- 2) Fire Patterns. The analysis of effects and patterns left by the fire, which may include patterns involving electrical conductors (see Chapter 6)*
- 3) Fire Dynamics. The analysis of the fire dynamics [i.e., the physics and chemistry of fire initiation and growth (see Chapter 5) and the interaction between the fire and the building's systems (see Chapter 7)]*

The following sections outline the use of the scientific method in determining and defining the area of origin within the loss location at 181 Clark Road, Brookline, MA.

ORIGIN DATA COLLECTION & DATA ANALYSIS

The scientific method proffers a methodology in which data is collected and analyzed and from that analysis more questions are formed and more data collected. While the articulation of this process is individualized (i.e., collect the data then analyze the data), in practice however, the two tasks are undeniably linked. The following section is a written record of the process of data collection and analysis of that data. Using the framework of the scientific method a continuous process of feedback from the analysis of the data is used to discover and collect additional data. This process leads to a necessary joining of much of the analysis into the data collection discussion. This principle of the process is also noted by the outer white arrows in the lower section of Figure 1) Scientific Method - NFPA 921 - 2021 edition.

The data collection and analysis is documented below.

Witness Statements:

Witness statements were taken from owner Marc Rysman. The witness statements were consistent with the background information in that his high school daughter came home from school and a short time later heard the fire alarms. She exited the building and called the fire department. Full review of statements of the homeowner and any other interested party will be covered in a supplementary report if necessary.

Fire Patterns:

Initial view of the Bathroom showed that there was char and fire damage in the space above the ceiling of the second-floor bathroom and below the third-floor flooring. Further the charred area was limited in space and deepest in the area just outside the bathtub/shower. There was no charring and only light soot damage to the second-floor bathroom. The third floor also had a bathroom above the second-floor bathroom which sustained some damage from the fire breaking through the floor. The char pattern on the flooring showed a fire moving from within the void space into the third-floor bathroom crawl space area. Electrical activity on wiring was found in the area of the hole into the third-floor bathroom crawl space. This area was the same area that the second-floor bathroom fan had been installed in.



Photo: 2) Second floor bathroom area of fan and hole through to third floor

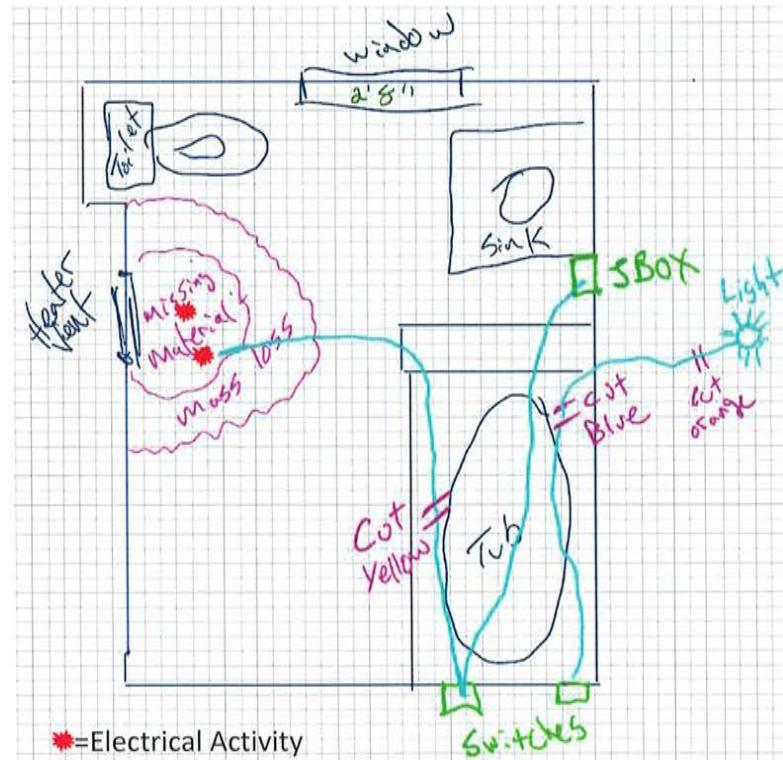


Photo: 3) Arc mapping

Fire Dynamics:

The process of analyzing the fire dynamics of a particular fire involves understanding the change of the fire from incipient stage through the growth of the fire. In this case, all of the fire patterns and data are consistent with the fire dynamics of a fire starting in the void space above the second-floor bathroom and breaking out into the third floor. If necessary, further detailed fire dynamics analysis will be described in a supplementary report.

ORIGIN HYPOTHESIS DEVELOPMENT

The meticulous collection and analysis of the available data lead to the development of several hypotheses as to the origin of the fire in this case.

- Hypothesis #1: A hypothesis in which the fire started in the second-floor bathroom.
- Hypothesis #2: A hypothesis in which the fire started in the void space of the ceiling above the second-floor bathroom.
- Hypothesis #3: A hypothesis in which the fire started in the third-floor bathroom crawl space.

ORIGIN HYPOTHESIS TESTING

Testing of Hypothesis #1: A hypothesis in which the fire started in the second-floor bathroom.

- There was no charring and only minor soot damage in the second-floor bathroom.
- All ignition sources in the second-floor bathroom were inspected and eliminated as the cause of the fire.

A hypothesis in which the fire starts in the second-floor bathroom can be eliminated for this case.

Testing of Hypothesis #2: A hypothesis in which the fire started in the void space of the ceiling above the second-floor bathroom.

- There was heavy charring on structural members in the void space in the area of the tub.
- A bathroom ceiling fan had been in place within the void space and was heavily fire damaged.
- Electrical activity was found on wiring within the void space.

A hypothesis in which the fire starts in the void space of the ceiling above the second-floor bathroom cannot be eliminated for this case.

Testing of Hypothesis #3: A hypothesis in which the fire started in the third-floor bathroom crawl space.

- All ignition sources within the crawl space were inspected and eliminated as the cause of the fire.
- Fire patterns and fire dynamics indicate a fire that breached the floor and moved into the crawl space.
- The fire patterns and fire dynamics are not consistent with a fire that moved from the crawl space into the void space of the second-floor bathroom ceiling.

A hypothesis in which the fire starts in the third-floor bathroom crawl space can be eliminated for this case.

ORIGIN FINAL HYPOTHESIS SELECTION

Once the data collection, analysis, hypothesis development and hypothesis testing has been iterated to completion, the final remaining hypothesis is selected as the most probable hypothesis. NFPA 921, 2021 edition states:

18.7 Selecting the Final Hypothesis.

Once the hypotheses regarding the origin of the fire have been tested, the investigator should review the entire process, to ensure that all credible data are accounted for and all credible alternate origin hypotheses have been considered and eliminated. When using the scientific method, the failure to consider alternate hypotheses is a serious error. A critical question to be answered by fire investigators is, "Are there any other origin hypotheses that are consistent with the data?" The investigator should document the facts that support the origin determination to the exclusion of all other potential origins.

All available data has been collected and analyzed and the process has been documented in this report. From this analysis, hypotheses were developed. Those hypotheses were tested and eliminated with one final hypothesis remaining.

Through application of the scientific method an area of origin is defined. The area of origin in this case is defined as the void space of the ceiling above the second-floor bathroom. This is consistent with the collection of evidence which involved only those items within the void space of the ceiling above the second-floor bathroom and a similar exemplar unit.

Evidence Collected

At the conclusion of the January 9, 2019, scene examination, evidence was recovered and stored for future analysis. On October 29, 2019, the evidence was examined in detail. A list of the retained evidence is included below:

Evidence Information

Item: Description:

- 1 Fan Components from Floor Debris
- 2 Ceiling Fan Artifacts
- 3 Exemplar Fan from Second Floor Bathroom
- 4 Wiring from 2nd Floor Bathroom Ceiling

LABORATORY EXAMINATION AND CAUSE ANALYSIS

This origin and cause analysis, as well as the resulting determinations, followed the guiding principles of NFPA 921: Guide for Fire and Explosion Investigations, 2021 Edition. The origin was validated through analysis of the available fire patterns, witness statements, and fire dynamics (physics and chemistry of fire).

In a fire event, once the area of origin is defined, the next step during a fire analysis is to determine the cause of the incident, that is, identification of the competent ignition source and the scenario that caused ignition of the available fuel. Further, this portion of the analysis addresses the factors that brought the ignition source and the first fuel together.

NFPA 921, 2021 Edition, Section 19.1.1 states:

The determination of the cause of a fire requires the identification of those factors that were necessary for the fire to have occurred. Those factors include the presence of a competent ignition source, the type and form of the first fuel ignited, and the circumstances, such as failures or human actions, that allowed the factors to come together and start the fire.

According to NFPA 921, a credible fire cause determination is based upon analysis of all the available evidence and can only be accomplished through the credible elimination of all other potential ignition sources within a validated origin area, provided that the remaining ignition source is consistent with all known facts. This involves the development, testing and rejection of alternate hypotheses and is only as reliable as the quality of data collected, analyzed, and interpreted.

This analysis of the potential ignition sources is considered in light of all of the information provided to date and the relationship to ignition and fire dynamic principles.

CAUSE DATA COLLECTION & DATA ANALYSIS

Laboratory Examination of Evidence on October 29, 2019:

Laboratory examination of the evidence collected from the fire scene was conducted on October 29, 2019, for the purpose of analyzing for fire cause. The following section contains a summary of the findings from the inspections of the evidence. A complete and thorough detailing of the collection of data and analysis relative to cause can be provided in a supplementary report if needed. Highlights of the data collection and analysis are below.

Evidence Item #1 is Fan Components from Floor Debris.

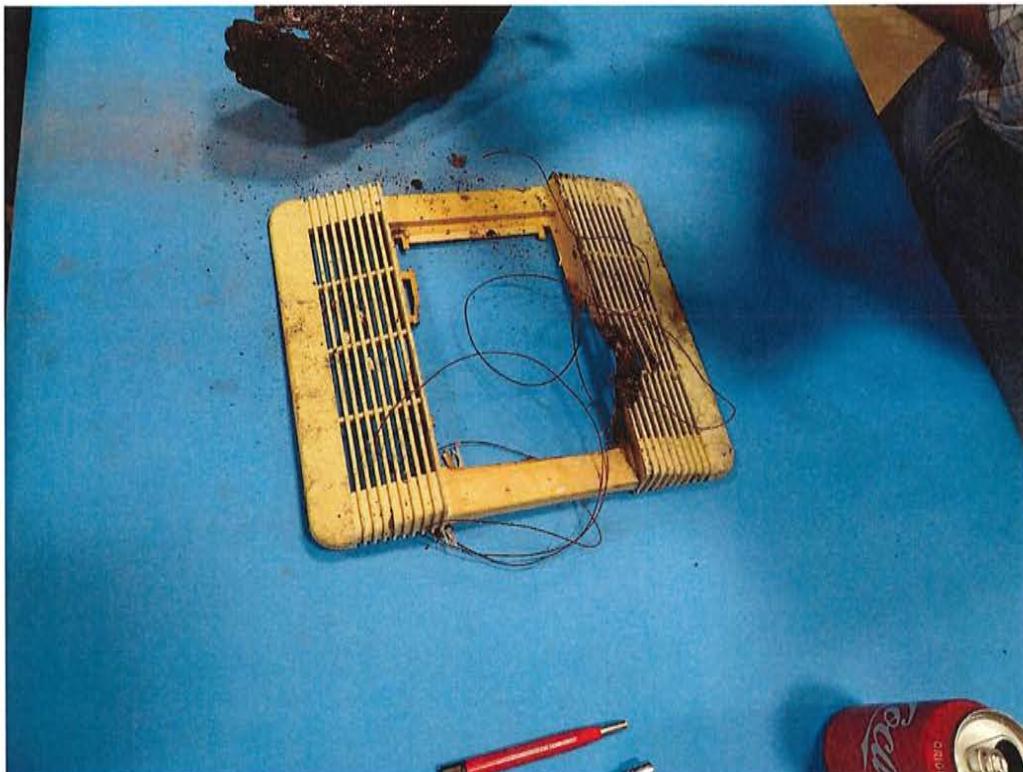


Photo: 4) Fan Components from Floor Debris

The first piece of evidence examined at the laboratory examination was "Fan Components from Floor Debris". This consisted of some sections of wire and the vented fan cover. The cover showed evidence of charring before it fell to the floor. It was also stamped "NuTone" in the plastic. No electrical activity was found on the sections of wire.

Evidence Item #2 is Ceiling Fan Artifacts.



Photo: 5) NuTone Fan

The second piece of evidence examined at the October 29, 2019, laboratory examination was Ceiling Fan Artifacts.



Photo: 6) Internal fan wall with wire arc welded to metal



Photo: 7) Electrical activity internal to fan

The ceiling fan was disassembled and inspected in the laboratory. The fan motor was found to be damaged. The paper wrap was partially intact. The windings were mostly intact with one area showing melting and turn to turn shorts. Within the internal connection junction box electrical activity was found. The electrical activity was found between a braided fan wire and the internal metal divider wall.

Evidence in the form of melted zinc and a shadow ring indicate a bushing was used on the incoming building wiring.



Photo: 8) Paper wrap portion intact



Photo: 9) Turn-to-turn damage on windings

Evidence Item #3 is Exemplar Fan from Second Floor Bathroom.



Photo: 10) Exemplar Fan from Second Floor Bathroom

The first piece of evidence examined at the October 29, 2019, laboratory examination was Exemplar Fan from Second Floor Bathroom. This exemplar fan came from the master bathroom on the second floor. The fan showed a buildup of lint and dust internal to the fan.

Evidence Item #4 is Wiring from 2nd Floor Bathroom Ceiling.

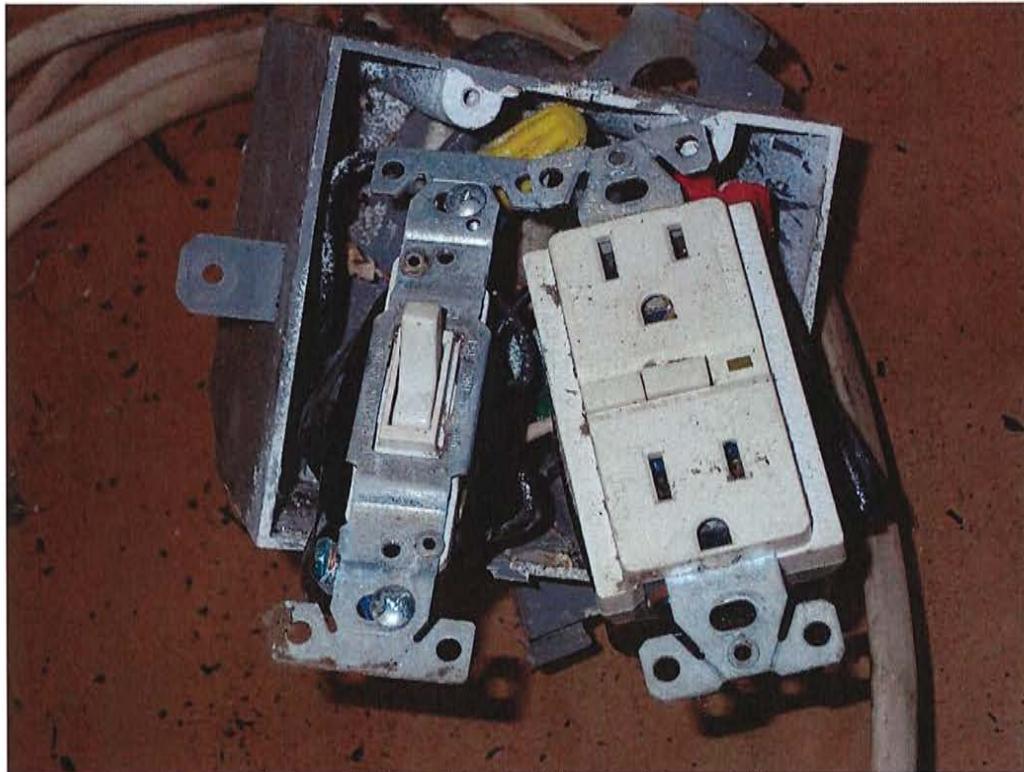


Photo: 11) Wiring from 2nd Floor Bathroom Ceiling

The first piece of evidence examined at the October 29, 2019, laboratory examination was Wiring from 2nd Floor Bathroom Ceiling. Mid run electrical activity was found on several of the circuits running through the second-floor bathroom ceiling. Electrical activity was also found on the wire end of the fan circuit. This is consistent and matches the electrical activity found within the fan connection box.

CAUSE HYPOTHESES DEVELOPED

NFPA 921, 19.5 Developing a Cause Hypothesis.

The investigator should use the scientific method (see the Basic Methodology) as the method for data gathering, hypothesis development, and hypothesis testing regarding the consideration of potential ignition sequences. This process of consideration actually involves the development and testing of alternate hypotheses. In this case, a separate hypothesis is developed considering each individual competent ignition source at the origin as a potential ignition source. Systematic evaluation (hypothesis testing) is then conducted with the elimination of those hypotheses that are not supportable (or refuted) by the facts discovered through further examination...

The meticulous collection and analysis of the available data lead to the development of several hypotheses as to the cause of the fire in this case.

- Hypothesis #1: A hypothesis in which the fire started in the NuTone ceiling fan motor.

- Hypothesis #2: A hypothesis in which the fire started in the NuTone ceiling fan connection junction box.

CAUSE HYPOTHESES TESTING

Testing of Hypothesis #1: A hypothesis in which the fire started in the NuTone ceiling fan motor.

- The fan motor was partially covered by the paper wrap which is often consumed in a fire.
- Some damage of the windings was noted with an area of turn-to-turn shorts, as is often seen in a motor failure.
- The exemplar fan motor indicated that the subject motor was thermally protected. This thermal protection has been known to fail in cases of non-polarized fan plug blades.
- The plug blades for the fan were not polarized.

A hypothesis in which the fire starts in the NuTone ceiling fan motor is determined to be “possible” and can be eliminated for this case.

Testing of Hypothesis #2: A hypothesis in which the fire started in the NuTone ceiling fan connection junction box.

- Electrical activity was found on the braided internal wiring of the connection junction box.
- The electrical activity occurred between the wire and the internal metal divider.
- Arc holes were present in the divider.
- The electrical activity is sufficient to ignite lightweight combustibles such as dust and lint.

A hypothesis in which the fire starts in the NuTone ceiling fan connection junction box is determined to be “probable” and cannot be eliminated for this case.

CAUSE FINAL HYPOTHESIS SELECTION

Once the data collection, analysis, hypothesis development and hypothesis testing has been iterated to completion, the final remaining hypothesis is selected as the most probable hypothesis. NFPA 921, 2021 edition states:

19.7 Selecting the Final Hypothesis.

Once the hypotheses regarding the "cause" of the fire have been tested, the investigator should review the entire process to ensure that all credible data are accounted for and all credible alternate cause hypotheses have been considered and eliminated. When using the scientific method, the failure to consider alternate hypotheses is a serious error. A critical question to be answered by fire investigators is, "Are there any other cause hypotheses that are consistent with the data?" The investigator should document the facts that support the cause determination to the exclusion of all other reasonable causes.

All available evidence was examined in the laboratory. Additional research and manufacturer data was also collected and analyzed. The thorough collection of data from this process is documented in this report and will be supplemented as needed and all available data has been collected and analyzed. From this analysis hypotheses were developed. Those hypotheses were tested and eliminated with one final hypothesis remaining.

Through application of the scientific method a cause of this fire has been determined. The cause of the fire in this case was electrical activity in the fan connection junction box which ignited the lightweight combustible dust and lint and then spread to the plastic wiring insulation and plastic fan components. This is consistent with the collection, examination and analysis of evidence.

RESPONSIBILITY FOR THE FIRE

NFPA 921, Section 20.5.2 states:

Definition of Responsibility: Responsibility for a fire or explosion incident is the accountability of a person or other entity for the event or a sequence of events that caused the fire or explosion, spread of the fire, bodily injuries, loss of life, or property damage.

20.5.1 Nature of Responsibility.

The nature of responsibility in a fire or explosion incident may be in the form of an act or omission. It may be something that was done, accidentally or intentionally, that ultimately brought about the fire or explosion, or it may be some failure to act to correct or prevent a condition that caused the incident, fire/smoke spread, injuries, or damage. Responsibility may be attributed to a fire or explosion event notwithstanding the determination of the fire cause. Responsibility may be attributed to the accountable person or other entity because of negligence, reckless conduct, product liability, arson, violations of codes or standards, or other means.

20.5.3 Assessing Responsibility. While it is frequently a court's role to affix a final finding of responsibility and to assign liability, remedial measures, compensation, or punishment, it

is the role of the person who performs the analysis to identify responsibility so that fire safety, code enforcement, or litigation processes can be undertaken.

Several sources of data were looked at in the process of analyzing for responsible party.



Figure 2) Exemplar name plate on fan

Several simple and cost effective (minimal to no cost) changes to the design and manufacture of internal fan connection junction box would have significantly reduced or eliminated the defects that directly lead to the cause of this fire. The internal vibrations from a motorized fan that lead to abrasion of the wiring could be reduced or avoided by internal strain relief, wire covering, or use of terminal blocks. Broan NuTone's failure of the internal wiring in the connection box of the fan is directly responsible for this fire.

CONCLUSION

I, Jeremiah Pratt (Genesis Forensics, Inc.) have completed an analysis of the December 17, 2018, fire at 181 Clark Road, Brookline, MA. In this case, the origin and cause of the fire was validated according to the guidelines in NFPA 921, NFPA 1033 and the principles of the scientific method. All the necessary evidentiary data that was collected in the form of interview information, fire patterns, fire dynamics, arc mapping, and the reported sequence of events support the definitive conclusion that the electrical activity in the NuTone ceiling fan connection junction box was the ignition source for this fire.

- Ignition Source – electrical activity in the fan connection junction box.
- First Fuel – the type and form of the first fuel was lightweight combustibles in the form of dust and lint.
- Mechanism – The mechanism that brought the ignition source and the first fuel together is the abrasion of the wire due to fan vibrations.

The cause analysis identified the ignition source, type and form of first fuels and the agencies and mechanisms, which allowed the ignition source and first fuels to come together, with the conclusion that the fire was caused by electrical activity in the connection junction box. The first fuels ignited were

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lightweight combustible dust and lint. The mechanism that brought the heat source and first fuel together is abrasion of the wiring caused by fan vibration. Broan NuTone is directly responsible for this fire.

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The analysis and opinions expressed herein are based upon the education, training, research, and experience of the undersigned in conjunction with the knowledge of the facts and information to date. If additional information becomes available that has a bearing on these opinions as expressed above, these opinions will be amended or supplemented as necessary.

Respectfully,

Jeremiah Pratt, P.E., CFI
Senior Fire Analyst, Electrical Engineer

A handwritten signature in black ink that reads "Jeremiah Pratt". The signature is fluid and cursive, with "Jeremiah" on the first line and "Pratt" on the second line.

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Appendix B - Curriculum Vitae for Jeremiah Pratt

JEREMIAH W. PRATT, PE, CFI, CFEI, CVFI

Qualifications & Curriculum Vitae

EXPERIENCE

Genesis Forensics, Inc., Sutton, MA

April 2020 – Present

Managing Partner, Fire & Engineering Failure Analyst

Forensic Electrical Engineer – Licensed P.E. (Massachusetts 54592, Rhode Island 12669)

- (NCEES) PE, (IAAI) CFI, (NAFI) CFEI, (NAFI) CVFI
- Conduct electrical scene inspections and analysis.
- Conduct forensic fire/electrical testing and evidence analysis.
- Determine the origin and/or cause of fires.
- Conduct interviews.
- Design analysis of products as it relates to failure modes and effects analysis (FMEA).
- Physical testing under burn hood as relates to FMEA.
- Electrical utility and transformer failure analysis.
- Residential and commercial building wiring systems and power distribution.
- Electrical failure analysis of heating and appliance electrical and mechanical components.
- Prepare comprehensive written reports regarding findings.
- Provide expert opinions and recommendations to clients and attorneys.
- Deposition and court expert witness testimony.
- Conduct technical review of cases with fellow analysts and engineers.
- Automotive/heavy equipment electrical failure analysis.

Wright Group, Inc., Uxbridge, MA

February 2014 – March 2020

Forensic Electrical Engineer

- Conduct electrical scene inspections and analysis.
- Conduct forensic fire/electrical testing and evidence analysis.
- Determine the origin and/or cause of fires.
- Expert witness in fire and hazard analysis specializing in electrical fires and failures.

Genesis Forensics

www.Genesis-Forensics.com

Experience – continued

Qinetiq North America, Franklin, MA

Senior Electrical Engineer

March 2011 – February 2014

- Directed Electrical staff in use of design and development processes, including use of Risk Analysis, Environmental Health & Safety Checklists (EH&S), Requirements Trace Matrix, Verification & Validation plans (V&V), Failure Modes Effects and Criticality Analysis (FMECA), and Design Reviews.
- Designed Personal area network modules for the Department of Defense (DOD).
- Coordinated National Stock Number project for the military joint command Precision Air Drop System

DCI Engineering Services, West Boylston, MA

Senior Electrical Engineer

June 2006 – February 2011

- Oversight of electrical engineering Staff, as lead Engineer.
- Co-managed projects with the Mechanical Engineering Lead.
- Chaired DFMEA, Risk Analysis, and Design Review sessions.
- Designed a 125 kilowatt microwave generator, engineering and commissioning custom 125kVA transformer.
- Designed and built networked charging garages for grocery warehouse automated robots.
- Designed ice cream vending machine which used a refrigeration unit, HMI screen, chill plate, control board and several robotic arms.
- Designed, documented and built machine for robotic semiconductor wafer inspection station.
- Engineered and built a distributed IO system for semiconductor processing machine.
- Designed power controller for an FDA regulated medical device worn by young children to detect abnormal eye movement.

Walker LDJ Scientific, Worcester, MA

Project / Electrical Engineer

September 2004 – June 2006

- Developed and managed new Test Department, including scheduling and tracking.
- Oversight of test Technicians.
- Wrote Microchip and LabView code for lift magnet charging and monitoring.
- Re-engineered hardware and software for the Microchip Pic based Magnetic Flux and Gauss Meters.
- Applied FFT analysis data point interpolation to the AMH-401 (hysteresis graph) software.

Cytyc Corporation, Boxborough, MA

Associate Electrical Engineer

January 2004 – September 2004

- Designed and implemented enhancements for FDA-approved medical devices
- Diagnosed Imaging System field returns.
- Investigated, designed, and implemented solutions for thermal issues in the Image Processing Computer.

Genesis Forensics

www.Genesis-Forensics.com

Experience – continued

Henry Pacific Plumbing & Heating, Marlborough, MA
Plumbing Apprentice

March 2003 - January 2004

- Plumbing apprentice for licensed plumber.
- Assisted in the installation of residential and commercial fixtures and plumbing equipment.

Best Buy Co., Inc., Marlborough, MA
Loss Prevention / Electronic Installer

December 2002 - January 2004

- Performed loss prevention functions and reviewed security tape in effort to reduce product losses.
- Installation of electronics in customer vehicles as a Mobile Electronics Certified Professional Installer.
- Diagnostics and repair of vehicle electronics in high end applications (media, communications, etc.).

Raytheon Company, Marlborough, MA
Electrical Engineer – Secret Security Clearance

March 2001 - August 2002

- Designed and supported a communications converter based on a Sun Ultra 5 running the Solaris OS.
- Performed cost analysis, prepared documents, and worked with Quality Control for design approval.
- Diagnosed trouble and failure reports on the Standard Terminal Automation Replacement System (STARS).

Simplex Grinnell, Westminster, MA
Associate Engineer

May 2000 – February 2001

- Qualified the electrical and mechanical design of smoke detectors and fire alarm systems.

Pratt Electrical Service, Marlow, NH
Electrician Apprentice

June 1992 - May 2000

- Electrical apprentice for master electrician.
- Assisted in the installation of residential and commercial wiring and electrical equipment.

EDUCATION

School of PE (Professional Engineering)
Electrical Engineering PE Review

Completed: March 2018

Modules:

- Basic Engineering Math
- Electronics Fundamentals
- Engineering Economics
- General Power Engineering
- National Electric Safety Code
- Arc Flash
- Electric Shock
- Circuit Analysis
- AC Fundamentals
- Transmission and Distribution
- Lighting
- Rotating machines

Worcester Polytechnic Institute, Worcester, MA
Bachelor of Science, Electrical Engineering
Minor in Computer Engineering

Graduated: May 2000

Related Course Work:

- Calculus
- Differential Equations
- Matrices & Linear Algebra
- Vector & Tensor Calculus
- Physics
- Oscillation, Waves & Optics
- Thermodynamics
- Heat Transfer
- Fluid Mechanics
- Control Engineering
- Chemistry
- Programming in C
- Techniques of Programming
- Fundamentals of ECE I&II
- Digital Circuits & Component Engineering
- Microelectronic Circuits
- Continuous Time Signal & System Analysis
- Discrete Time Signal & System Analysis
- Logic Circuits
- Microprocessor Systems
- Microprocessor System Design
- Computer Architecture
- Fire Protection Systems
- Fire Dynamics

Engineering Tests and Honors
Eta Kappa Nu Association, 2000
Engineer-in-Training (FE – EIT), 2000
Professional Engineer (PE), 2018

SPECIALIZED TRAINING & CERTIFICATIONS

Fire Investigation Member / Training Coordinator	2019 – Present
<i>Massachusetts District 7 Fire Investigation Unit, Southern Worcester County, MA</i>	
Certified Vehicle Fire Investigator	2019
<i>National Association of Fire Investigators, Bradenton, FL</i>	
Fire Investigator	2019
<i>National Board of Fire Service Professionals (Pro Board)</i>	
Certified Fire Investigator	2019
<i>International Association of Arson Investigators, Crofton, MD</i>	
Certified Fire & Explosion Investigator	2014
<i>National Association of Fire Investigators, Bradenton, FL</i>	
Fire Instructor I	2013
<i>National Board of Fire Service Professionals (Pro Board)</i>	
Firefighter/EMT-Basic	2008 - Present
<i>Douglas Fire Department, Douglas, MA</i>	
Fire Officer I	2006
<i>National Board of Fire Service Professionals (Pro Board)</i>	
Fire Fighter I/II	2005
<i>National Board of Fire Service Professionals (Pro Board)</i>	
Firefighter/First Responder	2001 - 2008
<i>Berlin Fire Department, Berlin, MA</i>	
Police Dispatcher/EMT-Basic	1997 - 2000
<i>Worcester Polytechnic Institute Police, Worcester, MA</i>	
Firefighter/First Responder	1994 - 2000
<i>Marlow Fire Department, Marlow, NH</i>	
Fire Origin & Cause Education	
Massachusetts Chapter of International Association of Arson Investigators, Chicopee, MA	March 2022
<i>Wood-Burning Fireplace Fire Investigations – 6 Hours</i>	

Specialized Training & Certifications – continued***IAAI Marine Fire Investigation Beaufort, SC***

Various Topic Modules - 32 Hours

Modules

- Nautical Terminology & Boat Construction
- Boat Systems & System Identification
- Public and Private Sector Roles
- Legal Aspects & Marine Policy Review
- Boat Raising and Recovery Logistics
- NPFA 921 & 1033 Overview
- Fire Inv. 101 & Fire Dynamics

CFI Trainer Modules

- The Scientific Method for Fire and Explosion Investigation
- Preparation for the Marine Fire Scene
- The Practical Application of the Relationship Between NFPA 1033 and NFPA 921

March 2022***Massachusetts Chapter of International Association of Arson Investigators, Yarmouth, MA*****October 2021**

A Comprehensive Perspective for New and Seasoned Fire Investigators – 20 Hours

Massachusetts Chapter of International Association of Arson Investigators, Dracut, MA**June 2021**

Wood-Burning Fireplace Fire Investigations – 6 Hours

Massachusetts Chapter of International Association of Arson Investigators, Auburn, MA**November 2019**

Lessons Learned from major fire investigation of the Worcester Cold Storage Warehouse Fire / Drone & 3D Mapping Technologies for Investigations – 6 Hours

NAFI Certified Vehicle Fire Investigator, Lexington, KY**September 2019**

Various Topic Modules - 36 Hours

Modules

- NFPA 1033 and 921 Updates
- Vehicle Fire Chemistry and Dynamics
- Vehicle Mechanical Systems
- Vehicle Electrical Systems
- Documenting the Vehicle Fire
- Vehicle Fire Safety Standards
- Standards Origin Determination

- Cause Determination
- Fire Investigation Safety
- Live fire evolutions
- Burned Vehicle Examinations
- Post-Collision Fuel Fed Fires
- Sources of Information
- Vehicle Arson

CFI Trainer Modules

- Basic Electricity
- Digital Photography and the Fire Investigator
- Documenting the Event
- Fire Investigation Scene Safety
- Writing the Initial Origin and Cause Report

- How First Responders Impact the Fire Investigation
- Investigating Fatal Fires
- Motive, Means, and Opportunity
- The Scientific Method for Fire and Explosion Investigation
- Fundamentals of Interviewing

Specialized Training & Certifications – continued***Massachusetts Fire Academy, Stow, MA******November 2018***

Various Topic Modules - 48 Hours

Modules

- NFPA 1033 Professional Development
- Basic Criminal Investigation
- NFPA 921 & Scientific Method
- Fire Cause
- Legal Considerations
- Hazmat 101
- Biohazard Safety
- Management of Major Investigations
- Evidence Collection
- Sources
- Wildland Fires
- Analyzing and Documenting
- Planning
- Failure Analysis
- Fire Protection Systems
- Unit Resources
-
- Fire Standard Compliant Cigarette Program
- Fire Patterns
- Motor Vehicle Theft
- Building Systems
- Basic Fire Science
- Documenting the Scene
- Fatal Fires
- Fire Related Human Behavior
- Incendiary Fires
- Basic Explosion Investigation
- Motor Vehicle Fire
- Electricity and Appliances
- Clandestine Lab Team
- Juvenile Fire Setters

National Association of Subrogation Professionals, New Orleans, LA***March 2018***

Fire: Burning Down the House - Subrogation Litigation Skills & Management Conference – 12 Hours

Massachusetts Chapter of International Association of Arson Investigators, Chicopee, MA***March 2017***

NFPA 921 2017: Updates/Fire Investigation Case Studies – 6 Hours

National Association of Subrogation Professionals, Worcester, MA***May 2014***

NASP's Subro College 200 Training Session – 6 Hours

NAFI Certified Fire & Explosion Investigator, Richmond, KY***March 2014***

Eastern Kentucky University - Various Topic Modules - 36 Hours

Modules

- Fire Investigation Methodology
- Fire Investigation Documentation
- Fire Investigation Photography
- Fire Dynamics
- Fire Patterns Analysis
- Origin Determination – Heat & Flame Vector Analysis
- Basics of Explosions and Explosion Investigations
- Basic Electricity for Fire Investigators and Electrical Ignition Sources
- Legal Issues and Cognitive Bias in Fire Investigation
- Cause Determination

Massachusetts Chapter of International Association of Arson Investigators, Chicopee, MA***March 2014***

Furnaces, NFPA 921 & Daubert – 6 Hours

Specialized Training & Certifications – continued**Presentation & Instruction Experience**

- Massachusetts District 7 Fire Investigation Unit, *Fire Effects and Fire Patterns*, April 2022
- Massachusetts District 7 Fire Investigation Unit, *Basic Fire Dynamics Through Michael Faraday's Candle Experiments*, March 2022
- Massachusetts District 7 Fire Investigation Unit, *Why do we need to use NFPA 921: Guide for Fire and Explosion Investigations and NFPA 1033: Standard for Professional Qualifications for Fire Investigators?* January 2022
- National Association of Subrogation Professionals (NASP) Fall 2021 Annual Conference: "Don't You Recall? Understanding CPSC's Recall Process, How to Use Evidence of a Recall to Advance Your Case, and Recent Top Recalls"
- Massachusetts District 7 Fire Investigation Unit, *Differentiation of Electrical Activity vs. Melting*, October 2021
- Massachusetts District 7 Fire Investigation Unit, *Introduction to Vehicle Fire Patterns*, September 2021
- Massachusetts District 7 Fire Investigation Unit, *Fire Effects on Light Switches*, August 2021
- Douglas Fire Department Training, 2012 - 2018

Controlled Live Burn Experience

- Live marine fire training in Beaufort South Carolina at IAAI Marine Fire Class
- Live fire training in Hyannis Massachusetts at 2021 MA IAAI Conference.
- Live fire training of dryer components at Genesis Forensics Test Site Mendon Massachusetts.
- Live vehicle fire training in Lexington Kentucky at NAFI Vehicle Fire Class
- Live fire training in Dayville Connecticut Fire Department Burn Tower.
- Live fire testing of various materials at the Wright Group, Inc. under burn hood.
- Live fire training at Eastern Kentucky University, two live fire burn cells.
- Live fire training in Douglas Massachusetts Fire Department burn cell trailer, Sprinkler system activation.
- Live fire training in Douglas Massachusetts Fire Department burn cell, Kitchen fire.
- Live fire training in Milford Massachusetts Fire Department Burn Tower.
- Live fire training in Worcester Massachusetts Grove Street Fire Department Burn Tower.
- Live fire suppression training in Berlin Massachusetts during controlled burn of acquired building.
- Live fire training in Barnstable Massachusetts Fire Department Burn Building.
- Live fire propane suppression at Meadow wood area training facility New Hampshire.
- Live fire suppression training in Marlow New Hampshire during controlled burn of acquired building.
- Approximately two burns per week (for 9 months) in Simplex Grinnell burn building, recording and analyzing the response of subject fire detection and alarm systems to fires using various fuel sources.

Specialized Training & Certifications – continued

Fire / Emergency Medical Services Certifications

- Emergency Medical Technician – Basic, National Registry 1997, Massachusetts 2013
- Massachusetts Fire Training Council, Fire Instructor I, 2013
- Massachusetts Fire Training Council, Fire Officer I, 2006
- Massachusetts Fire Training Council, Fire Fighter I/II, 2005

Fire / Emergency Medical Services Training

- Massachusetts Firefighting Academy Basic Fire Investigation, 2018
- Massachusetts Firefighting Academy Advanced Protective Breathing Search and Rescue, 2013
- Massachusetts Firefighting Academy Advanced Emergency Vehicle Operator, 2012
- Driver Awareness for the Emergency Vehicle Operator Training, 2010
- Flashover Simulator Training, 2010
- Fire Operations in the Wildland/Urban Interface, 2010
- Massachusetts Department of Conservation and Recreation PMS-419 Engine Operator 2010
- Basic Wildland Fire, 2009
- Federal Emergency Management Agency National Incident Management System IS-00700, 2006
- Command and Control of Gas Emergencies, 2004
- Salvage Overhaul Training, 1998
- Fire Behavior Training, 1998
- Advanced Driver Training, 1998
- Defensive Driving Course, 1997
- Forcible Entry Training, 1997
- Fire Streams Training, 1997

Criminal Justice Training

- Quinsigamond Community College, Criminal Investigation Course Completed, 2002
- Quinsigamond Community College, Constitutional Law Course Completed, 2002
- M.C.J.T.C (Massachusetts Criminal Justice Training Council) Reserve / Intermittent Police Officer, 2001
- Law Enforcement and Private Security/Criminal Justice Information System Policies and Procedures, 1999

Other Certifications

Coastal Sailing School – Skippers Certificate, 2006

Mobile Electronics Certified Professional Bronze Level Basic Installer (MECP), 2003

PADI Open Water Dive Certification, 1998

MEMBERSHIPS

Institute of Electrical and Electronic Engineers (IEEE)

International Association of Arson Investigators (IAAI)

National Association of Fire Investigators (NAFI)

JEREMIAH W. PRATT, PE, CFI, CFEI, CVFI

Deposition & Trial Log

DEPOSITION TESTIMONY

1. March 5, 2015

United States District Court, District of Massachusetts

Plaintiff: Cumis Insurance Society, Inc. a/s/o Service Credit Union

Defendant: Jutras Signs, Inc. (Client) & Eric Stewart

2. December 17, 2015

United States District Court, District of Maine

Plaintiff: Acadia Insurance Company a/s/o Eldredge Lumber and Hardware

Defendant: Merkel-Korff Industries and Fluid Management, Inc. (Client)

3. June 24, 2016

Superior Court J.D. of New London, Connecticut

Plaintiff: Marsha Menghi and Louis Menghi

Defendant: Connecticut Light & Power Company (Client) and Estate of Henry Gardiner

4. July 22, 2016

United States District Court for the District of Connecticut

Plaintiff: State Farm Fire and Casualty Company A/S/O Jefferson Mitchell and Stephanie

Mitchell

Defendant: The Connecticut Light & Power Company (Client)

5. August 30, 2016

United States District Court District of Connecticut

Plaintiff: Harleysville Worcester Insurance Company A/S/O The Marshall Realty Corp.

(Client) and Nationwide Mutual Insurance Company A/S/O Sanzaro

Landscaping, LLC

Defendants: Papa's Dodge, Inc., Hartford Truck Equipment, Inc. and Curt Manufacturing, LLC

6. September 16, 2016

Superior Court of New Jersey

Plaintiff: The Children's Place Retail Stores, Inc.

Defendants: Osram Sylvania, Inc. and Genlyte Thomas Group, LLC (Client)

7. October 12, 2017

Superior Court J.D. of New London Connecticut

Plaintiff: Michael Perry

Defendants: City of New London (Client) & Veolia Water North America-Northeast, LLC

Deposition Testimony – continued

8. April 20, 2018 – Part 1

United States District of District Court Rhode Island

Plaintiff: Guy Millick and Joanne Daly (Client)

Defendants: LG Electronics USA, Inc. LG Electronics (Tianjin) Appliances Co., Ltd., Sears Roebuck and Company

9. April 30, 2018 – Part 2

United States District of District Court Rhode Island

Plaintiff: Guy Millick and Joanne Daly (Client)

Defendants: LG Electronics USA, Inc. LG Electronics (Tianjin) Appliances Co., Ltd., Sears Roebuck and Company

10. May 23, 2019

Commonwealth of Massachusetts Hampshire Superior Court

Plaintiff: Norfolk & Dedham Mutual Fire Insurance Company, a/s/o Casablanca Halal Market, Ohio Security Insurance Company, a/s/o Norwottuck Inn Holding Co., LLC (Client) also as Third-party Defendant, Et al.

Defendants: Alliance Laundry Systems, LLC, Robert Shaw Controls Company, Inc. and Richard Czarniecki, individually and d/b/a Hadley Coin Op Laundromat also as Third-party Plaintiff.

11. December 30, 2020

Commonwealth of Massachusetts Essex Superior Court

Plaintiff: Bay State Insurance Company, a/s/o Joseph Sera and Jean Sera

Defendant: NSTAR Electric Company d/b/a Eversource Energy (Client)

ARBITRATION TESTIMONY

1. September 14, 2018

American Arbitration Association

Plaintiff: Uxbridge Pro Storage, Inc. (Client)

Defendant: Solar Roof Systems, LLC and Roof Management Services, LLC, Goodless Brothers Electric Co., Inc., Aslan Electric, Inc., Rav & Associates, Inc., and Richard Volkin

TRIAL TESTIMONY

1. November 18, 2016

Superior Court J.D. of New London, Connecticut

Plaintiff: Marsha Menghi and Louis Menghi

Defendant: Connecticut Light & Power Company and Estate of Henry Gardiner